

U.S. Environmental Protection Agency
Office of Wasie Programs Enforcement
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POWERINE OIL COMPANY SANTA FE SPRINGS, CALIFORNIA

RCRA COMPLIANCE EVALUATION INSPECTION

REPORT

TES 12

Technical Enforcement Support at Hazardous Waste Sites Zone IV Regions 3, 9, and 10

PRC Environmental Management, Inc.

POWERINE OIL COMPANY SANTA FE SPRINGS, CALIFORNIA

RCRA COMPLIANCE EVALUATION INSPECTION

REPORT

Prepared For

U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, D.C. 20460

Work Assignment No. R09020

EPA Region

Site No. CAD008383291 Date Prepared September 19, 1990 Contract No.

68-W9-0009 PRC No. 012-R09020 Prepared by

PRC Environmental

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RCRA INSPECTION REPORT

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9

TOXICS AND WASTE MANAGEMENT DIVISION

WASTE COMPLIANCE BRANCH

Purpose:

RCRA Compliance Evaluation Inspection

Facility:

Powerine Oil Company

Santa Fe Springs, California

Facility Mailing Address:

12354 Lakeland Road

P.O. Box 2108

Santa Fe Springs, California 90670-9833

Facility EPA ID Number:

CAD008383291

Date of Inspection:

July 30, 1990

EPA Representatives:

Richard Vernimen, Environmental Toxicologist

PRC Environmental Management, Inc.

415/543-4880

Tom Malott, Environmental Scientist PRC Environmental Management, Inc.

415/543-4880

Facility Representatives:

Donald DuRivage

Environmental Engineer

Report Prepared By:

Richard Vernimen

Report Date:

September 19, 1990

Barbara Sootkoos

Work Assignment Manager

9-19-90

Date Approved

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1.0 INTRODUCTION

PRC Environmental Management, Inc., (PRC) received Work Assignment No. R09020 from the U.S. Environmental Protection Agency, Region 9 (EPA) under Contract No. 68-W9-009 (TES 12). This work assignment calls for PRC to support EPA's enforcement of the Resource Conservation and Recovery Act (RCRA) by conducting compliance evaluation inspections (CEI) at hazardous waste generator facilities in Southern California. Each CEI involves reviewing relevant facility information, conducting a site inspection, preparing an inspection report, and conducting informal enforcement.

On July 30, 1990, PRC conducted a CEI at Powerine Oil Company (Powerine), located in Santa Fe Springs, California. The CEI consisted of a walk-through facility inspection and a review of applicable hazardous waste management documents. The CEI evaluated the facility's compliance with applicable Federal regulations specified in 40 CFR Parts 260 through 270, which regulate generators of hazardous waste. The evaluation included completing a checklist developed by EPA specifically for hazardous waste generator CEIs (Appendix A). This report summarizes the results of the inspection. Supporting documentation is provided in the appendices listed below:

Appendix A:

CEI Checklist

Appendix B:

Notification of Hazardous Waste Activity Form

Appendix C:

Inspection Photographs

Appendix D:

1989 Hazardous Waste Report

Appendix E:

Contingency Plan

2.0 FACILITY BACKGROUND

The following sections describe the facility, its regulatory status, and its hazardous waste activities.

2.1 FACILITY DESCRIPTION

Powerine is located at 12354 Lakeland Road in an industrial area of Santa Fe Springs, California. The Powerine facility consists of a refinery, an office building, a warehouse, and a truck loading area. The refinery has been at this site since the 1930s. However, the refinery's ownership, size, configuration and production volume has varied over its lifetime.

Powerine refines crude oil (primarily from the Alaskan North Slope) into a variety of fuels, depending on the needs of their customers. The fuel products include various grades of gasoline, diesel, and aviation fuels. In general, the refining process at Powerine consists of the following operations:

- Crude oil is heated in a tower to separate oil components by boiling point. Short chain hydrocarbon (oil) components generally have lower boiling points than the longer-chain components. Consequently, the short-chain fractions are separated from the crude oil first.
- As the temperature in the tower rises, longer-chain fractions "boil off" and are collected at their respective boiling points. This fractionating process continues until the tower reaches approximately 650°F. The oil remaining in the tower is known as "reduced crude." Reduced crude is composed primarily of long-chain molecules with boiling points higher than 650°F.
- The reduced crude is chemically "broken up" into shorter-chained components by a process known as "cracking." After the cracking process, the short-chain components are boiled off from the oil.
- After a series of the fractionating and cracking steps, the crude oil is reduced to a
 substance known as coke. Coke is composed of long-chain hydrocarbon molecules
 with very high boiling points. According to the facility representative, Donald
 DuRivage, the Powerine refinery underwent a "heavy oil upgrade" in 1982. This
 upgrade included installing a through-coker unit that breaks the coke into shorter
 hydrocarbon chains. These shorter chains are fractionated as described previously.
- Hydrocarbon fractions separated from the crude oil are purified by removing much of their sulfur content. Individual fractions may be further refined or blended with other chemicals to formulate specific products. One specific fraction-refining operation known as platinum reforming uses a platinum catalyst with a chlorinated solvent such as carbon tetrachloride to form more aromatic compounds in the fraction. Forming these aromatic compounds enhances the fraction's combustion properties. Fractions may also be blended with other fractions depending on the nature of the desired end product.

2.2 REGULATORY STATUS

On August 18, 1980, Powerine submitted a Notification of Hazardous Waste Activity form (Notification) indicating it was a hazardous waste generator (Appendix B). Powerine is still only a generator of hazardous wastes, and, according to facility representatives, has never treated, stored, or disposed of hazardous wastes on-site.

2.3 HAZARDOUS WASTE ACTIVITY

Powerine's 1980 Notification listed the following crude oil refining industry wastes:

Hazardous Waste	Hazardous Waste No.
Slop oil emulsion solids	K049
Oil/water separator sludge	K051
Tank bottoms (leaded)	K052

According to Mr. DuRivage, Powerine has not generated these K-wastes since the "through-coker" unit came on-line in 1982. The "through-coker" unit allows these wastes to be introduced back into the refining process.

Based on conversations with Mr. DuRivage and a review of Powerine's 1989 Hazardous Waste Report (biennial report), the facility currently generates the following RCRA-regulated hazardous wastes:

Hazardous Waste	Hazardous Waste No.
Chlorinated solvents from pretreatment of catalytic reforming operations	F001
Heat exchanger bundle cleaning sludge	K050
Waste corrosive liquid (sulfuric acid/water)	D002
Laboratory acid wastes containing chromium	D002/D007
Waste caustic liquid	D002
Spent hydrocarbon product filters	D001

Mr. DuRivage stated that pretreatment of catalytic reforming operations and cleaning of heat exchanger bundles occurs once or twice per year. The sulfuric acid/water mixture is generated from sulfur recovery operations. This mixture was the only RCRA-regulated hazardous waste observed on-site during the inspection.

Powerine also generates several non-RCRA regulated waste streams that are considered hazardous waste by the State of California. These wastes include waste oil, waste petroleum solids, sulfur-contaminated sand and gravel, spent charcoal, sulfur, and silicon catalyst and

desiccant beads. Silicon catalyst and desiccant beads and elemental sulfur wastes are generated during day-to-day operations. Other wastes are generated less frequently. Non-RCRA regulated hazardous wastes are generated in the greatest volume at Powerine.

Powerine operations and maintenance personnel are responsible for transferring wastes into 55-gallon steel drums at their source. These personnel are also responsible for any empty drums they may generate. Powerine has established the following "drum movement procedure" for their operations and maintenance personnel:

- 1. Each waste drum (empty, full, or partially full) should be labeled with a white Powerine label.
- 2. The label should contain the following information at a minimum:
 - a) Date the drum was filled or emptied
 - b) Material in the drum or material that was in the drum
 - c) Source of the material
- 3. The operations or maintenance supervisor should fill out a Drum Movement Control Form and send it to the warehouse with a work order to move the drum(s) to the holding area (accumulation area) in the contractor parking lot.
- 4. Warehouse personnel should move the drum(s) to the holding area and send the Drum Movement Control Form to Powerine's Environmental Department after filling out when and who moved the drums.
- 5. Powerine's Environmental Department will determine the proper labeling and disposal of the drums.

Powerine's Environmental Department has a contract with Waste-Materials Management (WMM) of Santa Ana, California, to manage the refinery's wastes once they have been delivered to the waste accumulation area. WMM's waste management activities include waste profiling (either by testing or applying Powerine's knowledge of the waste stream), repackaging, labeling, and arranging for transport off-site for disposal.

Surface water run-off from the refinery grounds and boiler water discharges are directed to a concrete-lined surface impoundment located at the southeast corner of the refinery. Powerine holds a National Pollution Discharge Elimination System (NPDES) permit for discharging run-off waters from this impoundment to a publicly-owned treatment works (POTW). Impoundment waters are tested quarterly to determine if the facility is in compliance with the water quality standards set forth in their NPDES permit.

3.0 INSPECTION OBSERVATIONS

Observations made during both the walk-through facility inspection and the subsequent review of applicable hazardous waste management documents are described below in Section 3.1 and 3.2, respectively.

3.1 FACILITY INSPECTION

The facility inspection focused on the hazardous waste accumulation area, south of the refinery. In addition, a perimeter inspection of the four-block refinery area was conducted. A closer inspection was conducted at the following refinery areas: (1) industrial boiler area; (2) run-off water surface impoundment; and (3) through-coker unit. No containers of hazardous waste (neither RCRA- nor state-regulated) were observed in the refinery area. Mr. DuRivage explained that all drums of hazardous waste, empty drums, and other containers are promptly moved to the hazardous waste accumulation area per Powerine's drum movement policy described in Section 2.3. Area-specific observations are described below.

3.1.1 Hazardous Waste Accumulation Area

The hazardous waste accumulation area (HW Area) is located in the southwest corner of Powerine's property, south of the refinery (Appendix C, Photograph No. 1). The HW area consists of an asphalt-covered area measuring approximately 40 yards long by 30 yards wide, and surrounded by a 7-foot high chain-link fence topped with barbed wire. A 6-inch high concrete curb also surrounds the HW Area on three sides. There were no signs posted on the perimeter fence indicating the area is used for accumulation of hazardous waste. In addition, there were neither fire extinguishers nor spill control equipment present.

According to the facility representative, the HW Area was originally constructed as a parking lot. The HW Area's south and west fencelines are constructed along Powerine's property line. A drive-in movie theater is located immediately south of the HW Area and the Coast Iron and Steel Company is located to the immediate west.

The majority of the containers observed in the HW Area were 55-gallon steel drums. These drums were arranged in aisles, on pallets on the east and west sides of the pad. The central part of the area was left vacant. Several empty drums were lined along the area's south fenceline.

RCRA- and non-RCRA-regulated waste streams, empty drums, and drums containing chemical products are accumulated in the HW Area. Drums were only roughly segregated by

waste stream and empty drums were dispersed among full drums. There were no signs on the fence or pavement markings designating the accumulation areas for different waste streams (sulfur, catalyst, desiccant, oil, empty drums). However, during the inspection, incompatible wastes were located at sufficient distances from each other.

Drums of RCRA-regulated hazardous waste (sulfuric acid, D002) were accumulated on the west side of the HW Area, away from non-RCRA regulated hazardous waste streams. However, as noted previously, some empty drums were also found in the RCRA-regulated hazardous wastes. All of the sulfuric acid drums were properly labeled and in good condition.

On the east side of the HW Area, the inspectors observed four 55-gallon steel drums labeled as "unknown solid" (Appendix C, Photograph No. 2). One of the drums was uncovered, revealing the contents to be a gray solid. The drum adjacent to this open drum was corroded and some of the solid contents had leaked through small holes in the bottom third of the drum (Appendix C, Photograph No. 2). The other two "unknown solid" drums were covered and appeared to be in good condition. According to Mr. DuRivage, the waste material was sulfur with perhaps some sand and gravel mixed in. The "unknown solid" drums were among other drums labeled as sulfur waste.

Although the majority of the empty drums were located along the south side of the HW Area, several empty drums were found among the full drums. Randomly selected drums were rocked back and forth by the inspectors to determine if any liquid remained in the drums. Approximately six of the "empty" drums contained quantities of liquid (approximately 1 to 5 gallons) that could have been pumped or emptied out. These drums were either unlabeled or were affixed with product labels that were either painted over or were faded and illegible. None of the "empty" drums were affixed with a white Powerine label as directed by Powerine's "drum movement procedure" outlined in Section 2.3 of this report. Consequently, it appeared that the drums were being managed as empty containers. However, according to Mr. DuRivage, Powerine's contractor, WMM, periodically polices the HW area to characterize, repackage, and label the contents of containers stored in the area.

3.1.2 Industrial Boiler Area

The industrial boiler area is located along the north-central boundary of the refinery. This area was targeted for inspection because it is the primary area for generation of heat exchanger bundle cleaning sludge (K050). At the time of the inspection, however, no heat exchanger bundle cleaning was being conducted and no K050 waste was found on-site.

Industrial boilers at Powerine produce steam for use in the facility's refining operations. The boilers use and recirculate several thousand gallons of water daily. Recirculated water is routed to the concrete-lined surface impoundment and is eventually discharged to a POTW in accordance with Powerine's NPDES permit.

3.1.3 Run-Off Water Surface Impoundment

The run-off water surface impoundment (Appendix C, Photograph No. 3) is located in the southeast corner of the refinery. Surface water runoff from the refinery grounds and boiler water discharges are directed to this impoundment, which measures approximately 20 yards in width by 30 yards in length and is approximately 5 feet deep.

According to Mr. DuRivage, all of the refinery's surface run-off is directed to this impoundment. At the time of the inspection, the impoundment was dry with the exception of an oily residue which coated the impoundment's concrete lining. Run-off water accumulated in the impoundment is analyzed quarterly and discharged in accordance with Powerine's NPDES permit.

3.1.4 Through-Coker Unit

The through-coker unit is located in the northeast section of the property and was targeted for inspection as a likely source of petroleum waste products. However, no wastes were observed in this area during the inspection.

3.2 DOCUMENT REVIEW

The inspection team reviewed the following hazardous waste management documents:
(1) Hazardous Waste Manifests; (2) Hazardous Waste Worker Training Plan; (3) 1989 Hazardous Waste Report; and (4) Contingency Plan.

3.2.1 Hazardous Waste Manifests

Hazardous waste manifests for wastes shipped from Powerine in 1990 were reviewed. The majority of these manifests were from non-RCRA regulated hazardous wastes. No discrepancies in the manifests were found. Manifests for RCRA-regulated hazardous wastes had proper Land Disposal Restrictions notifications and certifications attached.

United Pumping Service of City of Industry, California, is Powerine's primary waste transporter. U.S. Ecology, Inc., of Beatty, Nevada, is their primary disposal facility.

3.2.2 Hazardous Waste Worker Training Plan

Powerine's training plan and training records for their hazardous waste workers meet the requirements of 40 CFR Part 265.16.

3.2.3 1989 Hazardous Waste Report

Powerine's 1989 Hazardous Waste Report (Biennial Report) (Appendix D) meets the requirements for reporting described in 40 CFR Part 262.41 with the following exceptions:

- The names and addresses for each off-site treatment/storage/disposal (TSD) facility to which hazardous waste was shipped during the year.
- The name and EPA ID Number of each transporter used during the year to ship to the TSD.

3.2.4 Contingency Plan

The following deficiencies were found in Powerine's contingency plan (Appendix E):

- The plan does not list the current addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators.
- The plan does not list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability.

3.3 STATUS OF PREVIOUS VIOLATIONS

No outstanding violations or orders against the facility were identified from review of EPA's files. Files from the Los Angeles County Department of Public Health Investigation were not forwarded to PRC for review as of September 10, 1990. A request for these files was mailed on August 6, 1990.

3.4 DISCUSSION WITH FACILITY MANAGEMENT

Following the walk-through inspection, the inspection team held a brief meeting with Mr. DuRivage to discuss their observations. The inspectors brought the following observations to Mr. DuRivage's attention:

3.4 DISCUSSION WITH FACILITY MANAGEMENT

Following the walk-through inspection, the inspection team held a brief meeting with Mr. DuRivage to discuss their observations. The inspectors brought the following observations to Mr. DuRivage's attention:

- Waste drums in the hazardous waste accumulation area are poorly segregated. Specifically, separated areas for individual waste types should be established within the hazardous waste accumulation area. For example, waste-specific accumulation areas could be established by placing signs on the perimeter fence designating the waste type to be stored in a specified area. Also, lines could be painted on the asphalt to delineate specific hazardous waste accumulation areas.
- There are no signs on the perimeter fence designating the hazardous waste accumulation area.
- Empty drums were located among full drums in the hazardous waste accumulation area.
- Approximately six drums, which the facility had designated as empty, contained residual liquid (approximately 1 to 5 gallons).
- Employees need to be conscientious about storing ignitable or reactive wastes at least 50 feet from the facility's property line since the south and west boundaries of the hazardous waste accumulation area also form Powerine's property line.

4.0 POTENTIAL VIOLATIONS

Potential violations of RCRA regulations are listed below. Each potential violation includes: (1) description of how the regulatory performance standard was not met; (2) reference to the hazardous waste management unit or location of the potential violation; (3) reference to photographs or other documents as appropriate to ensure that all potential violations cited are substantiated; and (4) reference to the specific paragraph and subparagraph of the RCRA regulations violated.

- Powerine did not make a hazardous waste determination for the contents of the four 55-gallon drums in the hazardous waste accumulation area labeled "unknown solid" (Appendix C, Photograph No. 2). [40 CFR Part 262.11]
- Powerine's 1989 Biennial Report does not list the names and addresses of each TSD facility to which hazardous waste was shipped during the year.
 [40 CFR Part 262.41(a)(3)]
- Powerine's 1989 Biennial Report does not provide the name and EPA ID Number of each transporter used during the reporting year for shipments to a TSD facility. [40 CFR Part 262.41(a)(3)]

- One 55-gallon steel drum in the hazardous waste accumulation area, labeled as hazardous waste "unknown solid," was corroded and had leaked some of its solid contents (Appendix C, Photograph No. 2). [40 CFR Part 262.34(a)(1) directing to 40 CFR Parts 265.171 and 265.173(b)]
- One 55-gallon steel drum in the hazardous waste accumulation area, labeled as hazardous waste "unknown solid," was stored without a cover. [40 CFR Part 262.34(a)(1) directing to 40 CFR Part 265.173(a)]
- Powerine's hazardous waste accumulation area is not equipped with portable fire
 extinguishers, fire control equipment (including special extinguishing equipment, such
 as that using foam, inert gas, or dry chemicals), spill control equipment, or
 decontamination equipment. [40 CFR Part 262.34(a)(4) directing to
 40 CFR Part 265.32(c)]
- Powerine's contingency plan does not list addresses, phone numbers (office and home) of all personnel qualified to act as emergency coordinators. [40 CFR Part 262.34(a)(4) directing to 40 CFR Part 265.52(d)]
- Powerine's contingency plan does not list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability. [40 CFR Part 262.34(a)(4) directing to 40 CFR Part 265.52(e)]

APPENDIX A

CEI CHECKLIST

(213) 897 2802 fax

GENERATORS OF HAZARDOUS WASTE CEI CHECKLIST

For Facilities which only Generate, and Do Not Treat Store or Dispose of Hazardous Waste

SITE ID#: <u>C A D 0 0 8 3 8 3 3</u>	
SITE NAME: POWERINE OIL COMPANY	July 30, 1990
LOCATION: 12354 Lakeland Road	
Sante Fe Springs City	<u>C A 9 0 6 7 0 -9883</u> State Zip Code
LEAD INSPECTOR: Richard Vernimen	OFFICE: PRC-San Francisco
**********	*********
INDEX FOR GET	NERATOR'S CHECKLIST
Subpart & Page Content 261 + 262: 1: GENERATOR DETERMINATION -2: HW DETERMINATION RECYCLABLE MATERIALS 3: CONDITIONALLY-EXEMPT SMALL QUANTITY GENERATORS 4: CENERATORS — All not conditionally exempt 5: 100-1000 kg/month GENERATORS 7: FULLY REGULATED GENERATOR REQUIREMENTS 8: MANIFESTS 10: PRE-TRANSPORT REQUIREMENTS 12: RECORD KEEPING AND REPORTING 14: EXPORTS 18: IMPORTS 19: FARMERS 265: B1 GENERAL FACILITY STANDARDS- PERSONNEL TRAINING	40 CFR Subpart & Page Content 265: Continued C1 PREPAREDNESS & PREVENTION D1 CONTINGENCY PLAN & EMERGENCY PROCEDURES I1 USE AND MANAGEMENT OF CONTAINERS J1 TANKS
i	Also Completed: Transporter

LINE OUT ITEMS NOT APPLICABLE TO THIS FACILITY.

Pacility Representation Donald Du Rivacon - Environmental	<u>je</u>	Other Inspectors: Thomas Malott	
Documents Copied or I I. Contingency Plan 2. Manifests 3. Training Plan 4. Employee Training F 5. Biennial Report 6. NPDES atrly. Monitor for surface Impoundm	Record	Areas Present / Inspected: 1. Hazardous Waste Accumulation 2. Boiler Water And 3. Surface Water Rain-Off Impour 4. Area around Coker Unit 5. Facility Perimeter	
Facility Recipient of Report		DuRivage	
Mailing Address (if different)	P.O. Box Sante	Lakeland Road (2108 Fe Springs, CA 90670-988	3

Generators - General: (Part 261 Subpart A and Part 262 Subpart A)

Yes	No_	Comments
	·	·
<u> </u>		
:		~
\\ \frac{1}{1}		
8		PROPER HW DETERMINATION WAS MADE FOR MOST (~90%) OF WASTES ON-SITE BY APPLYING USER KNOWLEDGE
	<u>X</u>	HOWEVER - FOUR 55-901 STEEL DRUMS WERE LARELED WYELL "HAZARDUS WASTE" LABELS THAT
_	X	LACKED A WASTE ID LAME OF
d	×	WHITE POWERINE LABELS WERE ALSO AFFIXED, DESIGNATING TH DRUM'S CONTENTS AS "UNKNOWN" SOLID" L'reported by facility rep. to b SULFUR WASTE Which will be "profiled" (IDI) by WMM
	e e e	e × X ied × d

<u>Generators - General</u>: - Continued (Part 262 Subpart A)

(d) Evaluded on manufacial and only	<u>Yes</u>	No	Comments
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?		<u> </u>	see conment above
Recyclable Materials			
If the wastes are any of the following recyclable materials, also complete Part 266 Subparts C-G. 261.6(a)(2)	3		
(i) Those used in a manner constituting disposal (Subpart C)?(ii) HW burned for energy recovery in boilers and industrial furnaces not	_	X	
regulated as an incinerator (Subpart D)? (iii) HW characteristic used oil that		X	
is burned as above (Subpart E)? (iv) Those from which precious metals		<u> </u>	
are reclaimed (Subpart F)? (v) Spent lead-acid batteries that are	_	$\overline{\chi}$	
reclaimed (Subpart G)?		X	

Note: The following recyclable materials are exempt from EPA RCRA regulation: 261.6(a)(3)-

- (1) Industrial ethyl alcohol that is reclaimed (unless provided otherwise in an international agreement).
- (2) Used batteries or cells returned to the manufacturer for regeneration.
- (3) Used oil not burned for energy recovery.
- (4) Scrap metal.
- (5-9) Specified steel (KO87) and petroleum refinery production wastes.

Generators of Between 100 and 1000 kg/month - Continued Fully Regulated Generators (Part 262)

	Yes	No	Comments
Has the generator submitted a Notification of Hazardous Waste Activity (EPA Form 8700-12) and obtained an EPA ID number before handling HW? 262.12(a)			
Have they offered HW only to transporters or TSDs with an EPA ID#? 262.12(c)	\frac{1}{2}		
Generation Points (Satellite Accumulat	cion)		
The generator may accumulate HW at or near the point of initial generation without meeting storage deadlines provided: 262.34(c)(1)	Part of the second of the seco		
They have accumulated no more than 55 gallons of HW or one quart of acute HW and:	1?		NA-NO containers Observed in the satellite
The area is under the control of the operator of the process generating the waste? and:	; ;	_	accumulation areas.
(i) The container is in good condition compatible with the waste, and kept closed (except when HW is being removed or added)?	a.	_	
(ii) The container is marked with the words "Hazardous Waste" or other words that identify the contents?			
When HW accumulates in excess of the above amounts, does the generator: 263.34(c)(2)-			
Continue to comply with the storage requirements above? and:			
Mark the container holding the excess with the date the excess amount of HW began accumulating? and:			
Comply with all 90-day storage require	•-		

<u>Manifests</u>: (Part 262 Subpart B)

General Requirements: 262.20-	<u>Yes</u>	<u>No</u>	Comments
(a) Does the generator prepare a complete manifest according to the instructions (see Part 262 Appendix) before transporting HW off-site?	\checkmark		
(b) Does the generator designate on t manifest one facility which is permit to handle the HW?	he ted		
(c) Has the facility designated an emergency alternate facility? or:	_ ,	<u>~_</u>	
(d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?	<u> </u>	_	
Did the generator use the supplied manifest required by a consignment State: 262.21-			
(a) Where the receiving facility is located? or, if not provided by that state:	<u>~</u>		
(b) Where the generating facility is located?	<u>~</u>		
(c) If not provided by either state, the EPA form from another source?	<u>~</u>	_	
Did the manifest consist of enough copies? 262.22	<u>/</u>		
Did the generator: 262.23(a) (1) Sign the manifest by hand?	<u>/</u>		
(2) Obtain the signature of initial transporter and date of acceptance on manifest?	<u> </u>	_	
<pre>(3) Keep one copy of the manifest (per 262.40(a))?</pre>	<u>~</u>		
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)	<u> </u>		

Manifests: (Part 262)

Comments Yes No

Manifests: Continued-

If the shipment was sent by water or rail, did the generator send at least 3 copies of the manifest to the designated facilities? 262.23(c), -(d) NA

Pre-Transport Requirements: (262 Subpart C)

Is waste packaged in accordance with	<u>Yes</u>	<u>No</u>	Comments
DOT packaging regulations (49 CFR 173 178-9)? 262.30	· <u>√</u>	_	
Are waste packages labeled in accordance with DOT regulations (40 CFR 172.101)? 262.31			
Are containers marked in accordance with DOT regulations (49 CFR 172.101) 262.32(a) including:			
Proper shipping name [table column 2]	<u>/</u>	_	
Proper ID number [table column 3A]?	<u> </u>		
Proper ORM designation for containers of ORM-A,B,C,D, or E wastes?	<u> </u>		
Are containers of 110 gallons or less marked with the following words: 262.	32(b)		
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.			
Generators Name & Address	<u>√</u>		
Manifest Document Number	V		
Does the generator placard or offer the initial transporter the appropriat placards (49 CFR 172 Subpart F)?	ie		
262.33			

Record Keeping and Reporting: (Part 262 Subpart D)

Are the following kept for at least three years: MANIFESTS R	Yes No. Keviewed	FOR 1990 ONLY
(a) Manifest signed by the receiving facility?	<u> </u>	PER FACILITY REPRESENTATI
(b) Biennial Reports and Exception Reports?	<u> </u>	
(c) Test results, waste analysis or other determinations made in accordance with 262.11?		PER FACILITY REPRESENTATIVE
Biennial Report:		
If the facility has shipped any waste off-site to a U.S. TSD, have they submitted a Biennial Report to the RA by March 1 of each even numbered year 262.41(a)		
Was the report submitted on EPA Form 8700-13A and cover generator activities during the previous calendar year? 262.41(a)		
Does the report include the following information: 262.41(a)-		
(1) EPA ID No., name and address of the generator?		
(2) Calendar year covered by the report?		
(3) The EPA ID No., name, and address for each off-site U.S. TSD to which H was shipped during the year?		NAMES AND ADDRESSES OF TSD'S MESSING
(4) Name and EPA ID No. of each transporter used during the year to ship to a U.S. TSD?	<u>X</u>	NO TRANSPORTER INFO. PROVIDED
(5) Description, EPA HW No., DOT hazard class and quantity of each HW shipped off-site to a U.S. TSD?	<u> </u>	·
(i) Was this information listed by EPA ID No. of each off-site U.S. TSD to which HW was shipped?	62:11-	

Record Keeping and Reporting: - Continued (Part 262 Subpart D)

/6\ A done-tt	<u>Yes</u>	<u>No</u>	Comments
(6) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated?	\checkmark	_	
(7) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (back to 1984 if available)?	<u>~</u>		
(8) The signed certification?	<u>~</u>		
Exception Reporting: 262.42(a)-			
(1) For a generator of more than 1000 kg/mo. that has not received a signed copy of the manifest from the designated facility within 35 days, has the generator determined the status of the HW?	<u>~</u> ا	A	
(2) For a generator that has not received a signed copy of the manifes within 45 days, has the generator submitted an Exception Report to the RA?	t		
Did the Exception Report include: 262.42(a)-			
(i) A legible copy of the manifest?			
(ii) A signed cover letter explainin the efforts taken to locate the HW an the results of those efforts?			

Farmers: (Part 262 Subpart G)

	Yes	No	Comments
A farmer disposing of waste pesticides is not required to comply with Part 262 generator standards or Parts 270, 264, 265, 268, or 270 for those wastes provided: 262.70	1	VA	
(1) The pesticides are from their own use?	1	_	
(2) They triple-rinse each pesticide container in accordance with 261.7(b)(3)?			
(3) Dispose of the residues on their own farm in a manner consistent with the disposal instructions on the pesticide label?		/	

General Facility Standards: (Part 265 Subpart B)

Does the facility have a HW personnel training program? 265.16(a)(1)	Yes	No_	Comments
Is it directed by a person trained in HW management procedures? 265.16(a)(2)	<u> </u>	_	
Does the program include training in emergency procedures including contingency plan implementation? 265.16(a)(3)- and:	<u> </u>		
(i) Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment?	·		
(ii) Key parameters for automatic waste feed cut-off systems?	<u> </u>		
(iii) Communication or alarm systems?		_	
(iv) Response to fire or explosions?	<u>\</u>		
(v) Response to ground water contami- nation incidents?	<u></u>	_	
(vi) Emergency shutdown of operations?	<u>~</u>	_	
Are new personnel supervised until training is completed? 265.16(b)	<u> </u>		
Do new personnel complete the training within 6 months? 265.16(b)	<u>~</u>	_	
Do personnel take part in an annual reof the initial training? 265.16(c)	view		
Do personnel training records include for each HW position: 265.16(d)-			
(1) Job title and name of person filling the position?	<u>~</u>		
(2) Job Description?			
(3) Description of required HW training?			

	Yes	No	Comments
(4) Documentation that HW training or job experience required has been completed?	_	· 	
Are training records kept for current employees until closure, and past employees for at least 3 years? 265.16(e)	<u>/</u>		

Preparedness and Prevention: (Part 265 Subpart C)

	<u>Yes</u>	No_	Comments
Location Standards:			
The facility did not place HW in a s dome, salt bed formation, undergroun mine or cave?		í <u> </u>	
Is the facility maintained and operato minimize the possibility of fire, explosion, or releases of HW or HW constituents to air, soil, surface water which could threaten human health or the environment? 265.31	ited	_	
Does the facility have the following equipment where applicable: 265.32-			
(a) Internal communications or alarm system capable of providing immediatemergency instruction?			
(b) Telephone or 2-way radios at the scene of operation?	<u>~</u>	_	
(c) Portable fire extinguishers with water, foam, inert gas, dry chemical spill control and decontamination equipment?		<u>X</u>	THIS EQUIPMENT IS LOCAT THROUGHOUT THE REFINERY NOT IN THE HW ACCUM, ARE
(d) Water at adequate volume and pressure, or foam producing equipmen or automatic sprinklers, or water spray systems?	at,		
Does the facility test and maintain all emergency equipment in operable condition? 265.33	<u> </u>		
Do personnel in areas where HW is be handled have immediate access to intalarm or communication systems, or v or visual contact with another emplo 265.34(a)	ernal roice	_	
Can personnel that operate the facility while alone immediately access external emergency assistance 265.34(b)	?	_	·

<u>Preparedness and Prevention</u> - Continued (Part 265 Subpart C)

	<u>Yes</u>	<u>No</u>	Comments
Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35			
Arrangements With Local Authorities:			
Has the facility attempted to make the following arrangements/agreements:	B .		
Familiarize police, fire dept., and emergency response teams with HW operations? 265.37(a)(1)	<u></u>		
Designate primary emergency authority 265.37(a)(2)	? <u>√</u>	_	
With state emergency response team, contractors and equipment suppliers? 265.37(a)(3)		_	
Familiarize local hospitals with the properties of HW and the types of potential injuries and illnesses from exposure to HW? 265.37(a)(4)			
Did the facility document in the operating record any refusal by state or local authorities to enter into such arrangements? 265.37(b)			

Contingency Plan and Emergency Procedures: (Part 265 Subpart D)

Does the facility have a contingency	Yes	No_	Comments
plan designed to minimize hazards from fires, explosions, or any unplanned releases of HW or HW constituents?	1		
265.51(a) Does the plan describe actions person	<u></u>		
must take to comply with 265.51 and 265.56 responses? 265.52(a)		_	
Does the plan describe the arrangement agreed to in 265.37? 265.52(c)	<u>v</u>		
Does the plan list the current names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators? 265.52(d)	• —		ADDRESSES, PHONE NUMBERS (Office & Home) ARE NOT GIVEN
Does the plan name one person as prima emergency coordinator and list any oth in order of responsibility? 265.52(d)	ners ,	· ·	
Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability? 265.52(e)	_	<u>~</u>	NOT PROVIDED IN PLAN
Does the plan include an evacuation pl for personnel and a description of sig to begin evacuation, evacuation routes and alternate routes? 265.52(f)	mals		
Is the plan maintained at the facility? 265.53(a)	$\sqrt{}$		
Has the plan been submitted to all local emergency organizations that may be called upon in responses? 265.53(b)			
Has the plan been reviewed any immediately amended whenever: 265.54-			
(a) Applicable regulations are revised?	<u>~</u>		
(b) The plan fails in an emergency? (c) Facility changes required it?	\		

<u>Contingency Plan and Emergency Procedures</u>: - Continued (Part 265 Subpart D)

	Yes	No	Comments
(d) The list of emergency coordinators changes?			
(e) The list of emergency equipment changes?		_	
Is there at all times at least one employee at the facility, or close by and on call, designated as emergency coordinator? 265.55	<u></u>	· 	
Is this coordinator thoroughly familiar with all aspects of site operations, including locations and characteristics of waste handled, the locations of records, the facility layout, and emergency procedures? 265.55	<u></u>	·	
Does the coordinator have authority to commit the resources to carry out the contingency plan? 265.55			
If an emergency situation has occurre at this facility, did the emergency coordinator (EC) immediately:	d ,		
Activate alarm systems? 265.56(a)(1)	^/	A	
Notify the appropriate response agencies? 265.56(a)(2)	_	_	
Identify the character, exact source and amount, and real extent of any released materials? 265.56(b)			
Assess the possible direct and indire hazards from the release, including gases and run-off of fire fighting	ct	/	

Contingency Plan and Emergency Procedures: - Continued (Part 265 Subpart D)

If assessment indicates the release could threaten harm outside the facility, does the EC: Report his findings to appropriate authorities if it may be advisable to evacuate the local area, and remain on call to help the authorities decide 265.56(d)(1)		No.	Comments
Immediately notify either the government on-scene coordinator or the National Response Center's toll-free line at 800/424-8802? 265.56(d)(2)	<u>√</u>		
Did the report include: 265.56(d)(2)	•		
(i) The name and phone # of the reporter?	N/ 	4	
(ii) Name and address of the facility:	·		
(iii) Time and type of incident?	_	_	
(iv) Name and quantity of materials involved to the extent known?	_		
(v) The extent of any injuries?	_		
(vi) The possible hazards to the outside area?			
During the emergency, does the E.C. take all reasonable measures to minimize the release? 265.56(e)			
If the facility had to stop operations to respond, does the E.C. monitor all appropriate equipment? 265.56(f)			
After the emergency, does the EC immediately provide for the TSD of recovered or contaminated material resulting from the release? 265.56(g)		/	

Contingency Plan and Emergency Procedures: - Continued (Part 265 Subpart D)

	Yes No Comments
Does the EC ensure that in the affect areas of the facility: 265.56(h)-	ed
(1) Wastes incompatible with the released material are not handled until after clean-up is complete?	
(2) All emergency equipment is clean and fit for use before operations resume?	
Does the facility notify the R.A., st and local authorities that the above been done before resuming operations affected areas? 265.56(i)	has
If the contingency plan has been implemented:	
Did the operating record include the date, time, any details of each incident that required implementation of the contingency plan? 265.56(j)	NA
Within 15 days after the incident, did the facility submit a written report to the Regional Administrator? 265.56(j) and 265.77(a)	
Did the report include: 265.56(j)-	
(1) Name, address and phone # of the owner or operator?	
(2) Name, address, and phone # of the facility?	
(3) Date, time, and type of incident?	
(4) Name and quantity of materials involved?	
(5) The extent of any injuries?	
(6) A hazard assessment?	
(7) An estimate of the quantity and disposition of recovered material?	↓

Use and Management of Containers: (Part 265 Subpart I)

Comments Yes No A generator may accumulate HW on-site for 90 days or less without having a permit or interim status, provided that the waste is placed in containers that comply with the interim status requirements (Subpart I). Does the facility also comply with the Preparedness and Contingency Plan requirements of Subparts C and D? ONE STGAL Steel drum LABELEY Does the facility transfer HW from AS HW "UNKNOWN SOLID" WAS containers not in good condition or CORRODED AND HAD LEAKED leaking to containers in good condition? 265.171 SOME OF ITS SOUTH CONTE Are containers compatible with the HW stored in them? 265.172 ONE STEAL SEEL OF UM LABELED Are containers stored closed? HW "UNKNOWN SOLED" WAS STORED 265.173(a) w/o a LIED Are containers managed to prevent 11 rupture or leakage? 265.173(b) Are containers inspected weekly for leaks and deterioration? 265.174 Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176 Are incompatible wastes stored in separate containers? 265.177(a) Is HW not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b) Are containers holding HW that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device?

265.177(c)

Use and Management of Containers: - Continued (Part 265 Subpart I)

Are containers or inner liner that are not empty managed as HW? 261.7(a)(2) For a container to be considered empty facility must ensure that no more rema	. the	No	COMMENTS OF THESE CONTAINERS THE CONTENTS OF THESE CONTAINERS ARE CHARACTERIZED, REPACKAGED AND LABELED BY POWERINES CONTRACTOR, WASTE MATERIALS MANAGEMENT 261.7(b)(1)-
(i) Can be removed by conventional mea (e.g., pouring, pumping, etc.)? and:	ns -	X	APPROX. 6 "EMPTY" DRUMS IN THE HW. ACCUM. AREA "SLOSHED" LIQUID (~ 1-5 gal) UPON ROCKING THE DRUMS
(ii) One inch of residue on bottom of container or inner lining? or:	\checkmark		NO RESIDUE OBSERVED
(iii) (A) If the container is not over 110 gallons in size, 3% of weight when full?	<u> </u>		
(iii)(B) If the container holds over 110 gallons, no more than 0.3% of weight when full? or:	₩ F	-	NO CONTAINERS > 110 GALLONS
If holding compressed gas, is the container at atmospheric pressure? 261.7(b)(2)	N#	}	
If a container (or liner removed from the container) has held an acute HW, it is empty if: 261.7(b)(3)-			
(i) It has been triple rinsed using a solvent capable of removing the contents?		_	
(ii) Cleaned by another proven removal means? or:			
(iii) For the container, the liner prevented contact and has since been removed?		,	

See also 265.31 (p. Cl).

ACCUMULATION AREAS & CONTAINERS

	Maries of accommission of alega
	BOILER PEND (CKER UNIT)
Accumulation if Less than 55 gallons	
	NO CONTAINERS WERE
The generator may accumulate at or near	
the point of initial generation up to	OBSERVED IN THESE
55 gals of H.W., or one quart of acutely	AREAS DURING THE
hazardous waste, provided:	
	INSPECTION
The containers are marked either with	
the words "Hazardous Waste" or labels	'
that identify the contents? 262.34(c)(1)(ii)	
<u>AND</u>	
The containing our is and a select	
The containers are in good condition	
265.171.	
AND	
The containers are compatible with the	
waste 265.172.	
AND	
The containers are stored closed	
265.173(a).	
AND	
The containers must not be opened, handled	
or stored in a manner which may rupture the	
container or cause it to leak 265.173(b).	
	Acuto ARCA
HW	ACCUM. AREA
Accumulation if greater than 55 gallons	
Promingration of disperser digit to deting	
Are containers visibly marked with:	
WE CONTESTIBLE ATSTRATA HELVER ATRIL	
The date that the waste accumulation started?	, , ,
262.34(a)(2)	
404.34(4)(4)	
Managed Physical Control 25 24/a1/21	7
The words "hazardous waste"? 262.34(a)(3)	
er it.	
If the generator does not have interim	
status (as a TSD storage facility), have	
they accumulated H.W. on-site for less	V
than 90 days? 262.34(a).	
·	

		of accumulation	areas
Does the generator comply with the requirements of 40 CFR Part 265:	tccim. AREA		
Subpart I for the use and management of containers listed below. 262.34(a)(1)	4		
Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition? 265.171.	"Hazardous Wa	steel drum label ste-Unknown Solid and leaking.	ed
Are containers compatible with the H.W. stored in them? 265.172.	AND THE	I STEEL DEUM LAB SCHILL WAS STORE	ELED" HW
Are containers stored closed? 265.173(a).			
Are containers managed to prevent rupture or leakage? 265.173(b).	NO - <		
Are containers inspected weekly for leaks and deterioration? 265.174.	<u> </u>		
Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176.	4		
Are incompatible wastes stored in separate containers? 265.177(a).	<u> </u>		
Is H.W. not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b).			
Are containers holding H.W. that is incompatible with any waste or materials stored nearby in other containers, separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c).			
Does the generator comply with the requirements with 40 CFR Part 265.37: arrangements with local authorities?	See Main chec	klist	·
Does the generator comply with the requirements of 40 CFR Part 265: Subpart D for contingency plan and emergency procedures?	See Main chec	klist	
Does the generator comply with the require ments of 40 CFR Part 265.16 for personnel	•		
training in emergency procedures?	See Main chec	KIISt	

	Names	of accumulation	areas
Does the generator comply with the requirements of 40 CFR Part 265: Subpart C for Preparedness and Prevention listed below.	ACCUM. AREA		3
Does the facility have the following equipment where applicable: 265.32-			
(a) Internal communications or alarm system capable of providing immediate emergency instruction?	4		
(b) Telephone or 2-way radios at the scene of operation?	4		<i>8</i>
(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?	NO - THES E	QUIPMENT IS A HW ACCUMULAS	eaua to Arai Arai Arai
(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?	4		
Are the systems and equipment listed above tested? 265.33.	4		
Do all personnel have immediate access to the systems and equipment listed in 265.32 (a)-(d)?	4		
Is there adequate aisle space for uncistructed movement of fire, spill			
control and decontamination equipment in an emergency? 265.35.	7		

Land Disposal Restrictions: (Part 268)

1	Yes	No	Comments
Did the facility handle any waste restricted from land disposal* since its effective prohibition date: 268.1(b) (See attached listings)			fool - Chiorinated Solvents from pretreatment of catalytic reforming operations
F001 through F005 spent solvents? F020 through F026-28 Dioxins? "California List" wastes? First Third scheduled wastes? Second Third scheduled wastes?		\\	DOOZ - H2SO4/H2O PH<2
<pre>Exemptions: Are the prohibited wastes restrictions because:</pre>	ехеш	pted f	rom land disposal
The waste is from conditionally-exempts small quantity generators? 268.1(c)(4)		$ \underline{\checkmark} $	<u> </u>
A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(c)(5)		<u> </u>	<u> </u>
An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d)		<u> </u>	
If no restricted wastes were handled a exemption applies to <u>all</u> restricted was of this section.	1		
Exceptions: Can the restricted wastes	cont	inue t	o be land disposed because:
A case-by-case extension has been granted under Subpart C or 268.5, for the wastes handled? 268.1(c)(1)(all), 268.30(d)(3)(F001-5), 268.31(d)(3)(did 268.32(g)(2)(CA list), 268.33(e)(3)(1s	xins)	-	3rd), 268.1(c)(2)
An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a)		<u> </u>	

*Land disposal means placement in or on the land, including a landfill, surface impoundment, waste pile, land treatment facility, salt dome formation, underground mine or cave, injection well, or placement in a concrete vault or bunker for disposal. 268.2(a) Injection wells are being covered under a separate schedule.

Land Disposal Restrictions: - Continued (Part 268)

	<u>Yes</u>	0	<u>Comments</u>	
A generator certifies a good-faith				
effort in compliance with 268.8 "soft-		/		
hammer" regulations? 268.1(c)(5)		\checkmark		
		_		
If any of the preceding exceptions app dates and concentrations, Subpart D st restrictions do not apply. Waste anal certification requirements still perta	andards ysis an	and	Subpart E	storage
Has the handler not merely diluted the				
restricted waste or treatment residue				
in order to achieve compliance? 268.3	1			
` · · ·	<u> </u>			······································
Storage: NA Powerine & 5 o Are restricted wastes only being store (a)(1) A generator is using tanks or containers while accumulating a suffi-	d where	rate : 268	.so-	
ciently large batch to properly recove				. Λ
treat, or dispose?	,		[V	A
truet, or arspose.				· · · · · · · · · · · · · · · · · · ·
(a)(2) A TSD is accumulating a batch				
as above? and:				
				
(i) Each container is marked with the	:			
contents and accumulation start date?				······································
(ii) Each tank is marked with the				
contents, accumulation start date,				
quantity of HW, and/or the information	1			
is in the operating record?				
•				
(c) The TSD can prove that any storag	ze.			
over one year was solely for the purpo				
of necessary accumulation? or:				
The necessary decemberation: or.		_		
(d) The second one subject to an				
(d) The wastes are subject to an			1	
approved no-migration petition, case-				
by-case extension, a nation wide			İ	
variance, or a valid "soft hammer"				
268.8 certification?				
(e) The stored wastes already meet				
any applicable treatment, concentra-				
tion, or waiver standards?				
(f) After 7/8/87, are liquid HW over				
50 ppm PCBs stored for less than a				
• •				
year, and in a 761.65(b) (TSCA)			•	V
complying storage area?				

See p. 268:8 for off-site storage facility record keeping requirements.
-268:2-

Generators: Waste Analysis	<u>Yes</u>	No_	Comments
If restricted wastes are generated on- site, has the generator, using knowled or analysis, determined if the waste is restricted from land disposal? 268.7(a)			
Was the Paint Filter Liquids Test used to determine if waste sludges and solids were CA list liquids? 268.32(i)			
Did the generator determine if liquid CA list wastes sludges an solids were CA list liquids? 268.32(j)(1)			
Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2)			
Did the generator determine whether a HW listed in 268.10,11,12, exceeds the applicable treatment standards specified in 268.44 &43 by testing a representative sample of the waste extract or the entire waste or use knowledge of the waste? 268.34(i)(2)	•	<i></i>	
Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g)	The second secon		
Notices, Certifications, and Demonstra	ations	:	
If determined that the waste is restricted and requires treatment before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)-	<u></u>	· —	
 (i) EPA HW ID number? (ii) Appropriate treatment standards and prohibitions? (iii) Manifest number for the waste? (iv) Available waste analysis data? 	X X X	_ =	

Land Disposal Restrictions: - Continued (Part 268)

	Yes	No_	Comments
If the waste is determined to be restricted but not required further treatment, has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards			
<pre>and applicable prohibitions? 268.7(a)(2)</pre>	$\sqrt{}$	_	
Did the notification include: 268.7(a) (a) EPA HW ID number? (b) Appropriate treatment standards and prohibitions? (c) Manifest number for the waste? (d) Available waste analysis data?	(2)(1)		
Was the following certification signed	: 268.	7(a)(2	!)(ii)-
I certify under penalty of law that I with the waste through analysis and term to support this certification that the standards specified in 40 CFR 268 Subposet forth in 40 CFR 268.32 or RCRA seconformation I submitted is true, accurate significant penalties for submitting possibility of a fine and imprisonment	sting waste art D tion 3 ate and a f	or three completes of all the	cough knowledge of the waste lies with the treatment applicable prohibitions . I believe that the plete. I am aware that ther
If the generator's waste is subject to	_		
a national variance, an extension or a exemption, have they notified the receiving facility with each shipment waste that the waste is not prohibited from land disposal? 268.7(a)(3)	of .	-	
Did the notice include: 268.7(a)(3)- (i) EPA HW ID number? (ii) Appropriate treatment standards and prohibitions?	_	_	
<pre>(iii) Manifest number for the waste? (iv) Available waste analysis data? (v) The date the waste is subject to prohibitions?</pre>		=	

NOTE: If the recipient of the generator's waste is not on the attached list (p. 12) of known land ban facilities, or if an off-site shipment without notification has occurred, indicate the accepting TSD facility on p. 12 for proper follow-up.

Land Disposal Restrictions: - Continued (Part 268)

	<u>Yes</u>	No	Comments
If determined that the waste is a <u>First Third or Second Third waste without treatment standards</u> and not a CA list waste (and thus a "soft hammer" waste have they notified the receiving facility with each shipment? including: 268.7(a)(4)-		A	
 (i) EPA HW ID number? (ii) Appropriate certifications and the restrictions under 268.33(f) for "soft hammer" waste? (iii) Manifest number for the waste? (iv) Available waste analysis data? 		=	
If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)			·
Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)	<u> </u>	_	
Generators of First Third and Second : shipped for land disposal:	Third	"soft	hammer" wastes (268.33(f))
Prior to shipment for land disposal, has the generator certified and submitted to the RA a demonstration of a good faith effort to locate and contract with treatment and recovery facilities for the practically available treatment which provides the greatest environmental benefit? 268.8(a)(1-2)		A	
Did the demonstration include a list of facilities and representatives contacted, complete with addresses, phone numbers, and contact dates? 268.8(a)(2)			

	<u>Yes</u>	<u>No</u>	Comments
Was a copy of the demonstration submitted to the receiving facility with the first shipment of waste? 268.8(a)(3) or -(4)	- N	A:	·
Was a copy of the certification submitted with each shipment of waste? 268.8(a)(3) or -(4)		_	
Are copies of the demonstration and certification kept on-site for at least five years? 268.8(a)(3) or -(4)	_		
If the generator determined there is no practical treatment for his waste, did the demonstration include a writte discussion and the following certification? 268.8(a)(2)(i)	en \	<u> </u>	
I certify under penalty of law that the have been met and that disposal in a lonly practical alternative to treatment the information submitted is true, accepted are significant penalties for suther possibility of a fine and imprison	andfi nt cur curate nbmitt	<pre>ll or rently , and ing fa</pre>	surface impoundment is the available. I believe that complete. I am aware that
If the generator determines that there are practical treatments for the waste did they contract to use the technolog that they demonstrated yields the greatest environmental benefits? 268.8(a)(2)(ii)	≥ ,		
Did they include the following certification? 268.8(a)(2)(ii)	<u>√</u>	_	
I certify under penalty of law that the have been met and that I have contract provide treatment) by the practically greatest environmental benefit, as incentral that the information submitted is true that there are significant penalties including the possibility of a fine and	ed to avail licate e, acc	treat able t d in m urate, bmitti	my waste (or otherwise echnology that yields the y demonstration. I believe and complete. I am aware ng false information,
Has the generator immediately notified the RA of any changes in the condition on which the certification was based? 268.8(b)(1)		, _	

Land Disposal Restrictions: - Continued (Part 268)

Yes No Comments

If the RA invalidated a certification has the generator immediately ceased shipments of wastes, informed all facilities that received the waste, as retain records of the communication on-site in their files? 268.8(b)(3)	nd	Ř_	
Treatment Facilities: Waste Analysis	Ŋ	A.	
Has the facility tested their wastes as specified in their waste analysis plan (265.13)? 268.7(b)		_	
Were the non-wastewater form of the following HWs listed in 268.10, 268.1. & 268.12, incinerated in accordance with the requirements of Part 264 Subpart O, or burned in industrial furnaces or boilers in accordance with applicable regulatory standards: K027 K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V2237 268.43(3)	b ,		
Were the wastewater form of the following HWs listed in 268.10, 268.1 & 268.12, treated by carbon adsorption or incineration, or pretreatment followed by carbon adsorption: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V2237 268.43(4)	1		
Where the treatment standards are expressed as concentrations in the waste extract (268.41), has the	i L		

facility tested the treatment residues

or extract (using the TCLP, 268 Appendix I) to assure they met the applicable treatment standards?

268.7(b)(1)

<u>Land Disposal Restrictions</u>: - Continued (Part 268)

	163	110	COMMETTED
For CA list-only wastes, were the applicable 268.32 Paint Filter Liquids Test, pH test, HOCs, and PCB tests performed? 268.7(b)(2)	_	NA	
For wastes with treatment standards expressed as concentrations in the waste (268.43), was the treatment residue, not an extract, tested? 268.7(b)(3)			
Notifications and certifications:			
Has the treater submitted with each shipment to the land disposal facility a notice including: 268.7(b)(4)	,		
(i) EPA HW ID number?	_	_	
<pre>(ii) Appropriate treatment standards and prohibitions?</pre>			
(iii) Manifest number for the waste?	_		
(iv) Available waste analysis data?	-		
Has the treatment facility submitted a signed certification with each shipmen of waste or treatment residue to the land disposal facility stating that the treatment standards in 268 Subpart D were met? 268.7(b)(5)	t		
For wastes with treatment standards listed as concentrations (268.41 or43) did the certification read: 268.7(b)(5)(i)	_		· · · · · · · · · · · · · · · · · · ·
I certify under penalty of law that I with the treatment technology and oper support this certification and that, be immediately responsible for obtaining treatment process has been operated and the performance levels specified in 40	ation ased this d ma:	ns of the on my information in the interior of	ne treatment process used to inquiry of those individuals ation, I believe that the identification properly so as to achieve

-268: 8-

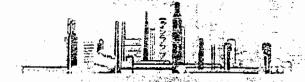
the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and

imprisonment.

V NA Pgs. 268:8-12

APPENDIX B

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY FORM



e Oil Company

ekeland Road, Santa Fe Springs, California 90670 (213) 944-6111

(213) 944-9861



Independent Refinery And Marketing Chain

ry F. Poll/Vice President-Manufacturing

August 16, 1980

E.P.A. - Region IX 215 Fremont Street San Francisco, CA 94105

Gentlemen:

Enclosed please find Powerine Cil Company's Notification of Hazardous Waste Activity. This notification is being submitted as required by Section 3010 of the Resource Conservation and Recovery Act.

Yours truly,

POWERINE OIL COMPANY

Vice President - Manufacturing

HFP/TLA: ds

Attachment

File:08/80:27

EPA Form 2700-12 (2-80)

GSA No. 0246-EPA-OT

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	ndles which may be whaz	TOOLS WASTE . USE NO.	Ditional sheets if necess			
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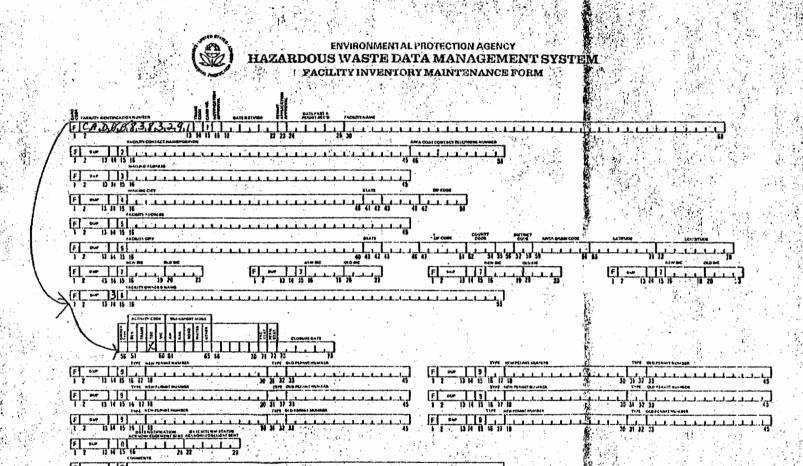
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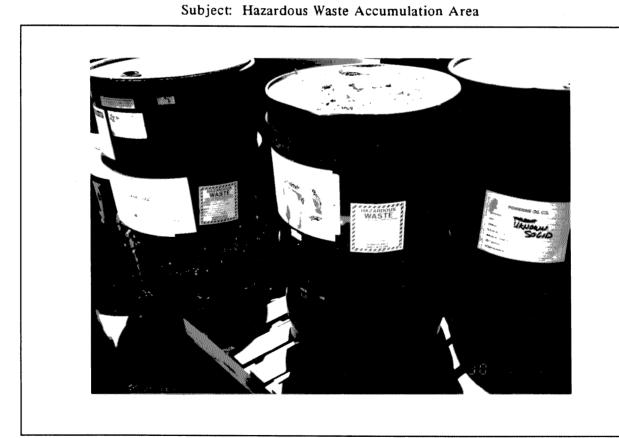
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APPENDIX C INSPECTION PHOTOGRAPHS



Photograph No. 1 Date: 7/30/90 Photographer: RV

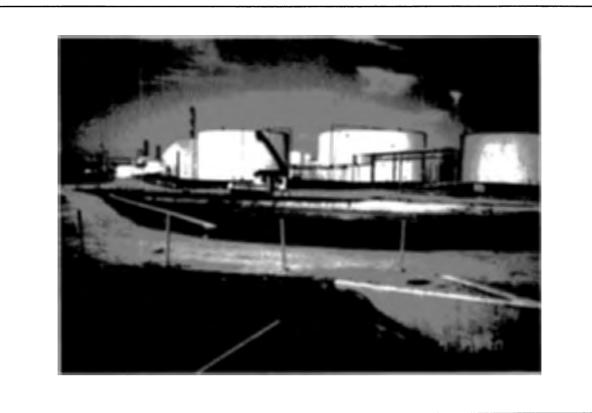


Photograph No. 2 Date: 7/30/90 Photographer: RV

Subject: Drums of Unknown Solid Hazardous Waste

Note: Open and Leaking Drum

Powerine Oil Company



Photograph No. 3

Date: 7/30/90

Photographer: RV

Subject: Run-Off Water Surface Impoundment

APPENDIX D 1989 HAZARDOUS WASTE REPORT

POWERINE Oil Company

12354 Lakeland Road, P.O. Box 2108 Santa Fe Springs, California 90670

(213) 944-9861 (213) 944-6111



TLX No: 4720404 A/B Powerne Telecopy No: 944-8522

OFFICE OF ENVIRONMENTAL COUNSEL

April 10, 1990

California Department of Health Services Toxic Substances Control Program Annual Report P.O. Box 3000 Sacramento, California 95812

Dear Sirs:

Transmitted is the Powerine Oil Company 1989 Hazardous Waste Report.

Very truly yours,

Don H. Baker III, Esq.

Don H. Baker III, Esq. Environmental Counsel

WJZ/DHB:aj

cc: B. Petersen

E. Houtz

T. Daniels

D. DuRivage

W. Ziemba

File

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: SITE NAME POWERINE OIL COMPANY		U.S. ENVIRONMENTAL PROTECTION AGENCY 1989 Hazardous Waste Report
EPAID NO. CIA DIO O BI 3 BI 3 2 9 1	FORM	IDENTIFICATION AND CERTIFICATION
INSTRUCTIONS: Read the detailed instructions beginning on page 7 of the	he 1989 Hazardous	Waste Report booklet before completing this form.
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	mpany name	POWERINE OIL CO.
Same as label or ———————————————————————————————————	n label C or	
D. Street name and number. If not applicable, enter industrial park, building name or other physical location	description	
Same as label 12354 LOKELAND ROND		
Same as label Correct SANTA FR SPGS, LOSANGELES	G. State Same as label D	H. Zip Code Serve as label D [4] 0 4 7 0 9 8 3
SEC # Mailing address of site. Instruction page 7.		
A. is the mailing address the same as the location address?		
B. Number and street name of mailing address	EC. #)	
	I	
C. City, town, village, etc.	D. State	E. Zip Code
SEC. III Name, title, and telephone number of the person who should be contact		
A. Please print: Last name First name M.L. B. Title	,ullonuental	2:13: 944-6:11/
BAKER, DON H.	OUNSEL	Extension (0)3710
SEC. IV Enter the Standard Industrial Classification (SIC) Code that describes the services rendered at the site's physical location. Enter more than or activities of the site. Instruction page 8.	ne SIC Code only if i	s, group of products, produced or distributed, or no one industry description includes the combined
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B. Please print: Last name First name BAKER, DON. H	MI	C. THO ENVIRONMENTAL COUNSEL
D. Signature Q H53 when IID		E. Date of eignature 04 LLO 901 MO. DAY YR.
		Page 1 of Z

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: SITE NAME POWERINE OIL COMPONY	U.S. ENVIRONMENTAL PROTECTION AGENCY 1989 Hazardous Waste Report
EPA D NO. (C.A.D. G. 6.83.83.29.1)	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Read the detailed instructions beginning on page 14 of	the 1980 Hazardous Waste Report booklet before completing this form.
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BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABER OR ENTER: SITE NAME POWERINE OIL COMPANY	PROTECTION AGENCY
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INSTRUCTIONS: Read the detailed instructions beginning	on page 14 of the 1989 Hazardous Wasts Report booklet before completing this form.
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SITE NAME BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: POWERINE OIL COMPONY



1989 Hazardous Waste Report

U.S. ENVIRONMENTAL PROTECTION AGENCY

EPA D NO.

CAOG683832911

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WASTE GENERATION AND MANAGEMENT

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BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: POWERINE OIL COMPONY

SITE NAME



1989 Hazardous Waste Report

U.S. ENVIRONMENTAL PROTECTION AGENCY

EPA ID NO.

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WASTE GENERATION AND MANAGEMENT

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Page 4 of 1/2

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POWERINE OIL COMPONY



U.S. ENVIRONMENTAL PROTECTION AGENCY

1989 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

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EPAID NO. [C_A_D_G_B_3_B_3_29_]] FORM GM WASTE GENERATION AND MANAGEMENT				
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APPENDIX E CONTINGENCY PLAN

POWERINE OIL COMPANY

REFINERY

EMERGENCY PREPAREDNESS PLAN

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POWERINE OIL COMPANY

EMERGENCY PREPAREDNESS PLAN

I. Introduction

A. Plan Purpose

The purpose of the Emergency Preparedness Plan (EPP) is to provide a plan for the essential actions of key persons in response to an emergency. The EPP sets forth the level at which certain functions will be accomplished and assigns roles and responsibilities for key and support functions.

B. Definition of an Emergency

An Emergency is defined as an unusual occurrence involving the Powerine facilities that requires rapid response to control and prevents or mitigate damage to facilities and harm to employees or the public. Emergencies have been categorized by the following types:

Type I:

Fire, Explosion, Natural

Disaster (Earthquake)

Type II:

Material Release

Type III:

Bomb Threat

The Emergency Types are divided into degrees of magnitude under the following code designation:

- Code 1: Containable by in-plant personnel, isolatable with unlikely chance of further damage or threat to personnel.
- Code 2: Any incident requiring evacuation, notification of emergency units, or notification of special clean-up crews. Containment by in-plant personnel is probable. Sounding of alarm is required.
- Code 3: Uncontrollable by in-plant personnel:

 Management and outside emergency units
 required. All emergency response units
 prepared to assist. Sounding of alarm
 is required.

Each Type and Code will trigger a specific response as described within the EPP.

C. Emergency Response Organization.

Each emergency will be responded to by key individuals whose responsibility it will be to control, contain and mitigate damage and injury. The Incident Management Team is organized as shown on Page _____.

Within the EPP the following is a list of abbreviations for key response units:

Call-Out Center COC Emergency Response Team (All Members) ERT ERT(OF)-Emergency Response Team (Off-Site) Emergency Response Team (On-Site) ERT(OS)-FC Field Coordinator Fire Department (General) FDIC Incident Coordinator TMI Incident Management Team (including all sub-coordinators) Off-Site Coordinator OFC OSC On-Site Coordinator Press Coordinator PC PD Police Department Pipeline Personnel P/LService Coordinator SC SFSFD -Santa Fe Springs Fire Department Wheel -Call Wheel for Pipeline Leaks ΗT Hazmat Team

The key individuals within the IMT have very specific duties and responsibilities and they are described on the pages to follow.

II. Incident Response

A. General Procedure for Incident Discovery

The general initiation procedure to be used in discovering an emergency is:

Discover:

the

- The discoverer will immediately notify supervisor of division by radio or phone.
- Take immediate action as appropriate to control, contain or mitigate damage and injuries.

Supervisor (On-Site Coordinator):

- 1. Assess status of the incident.
- 2. Call the Scale House (Call Out Center).
- Tell the Scale House the type of incident and code.
- Call on the radio or phone the appropriate in-plant response.
- 5. Take action to control, contain and mitigate damage and injury.
- 6. Appoint Field Coordinator from arriving supervisors.

Scale House (COC)

1. Initiate appropriate call-out.

EMERGENCY CLASSIFICATIONS & RESPONSES

The following are the minimum response to each code level and additional individuals may be required as determined by the Coordinator in charge of the incident. The response level for each code includes all lower level code response.

FIRE/EXPLOSION/DISASTER/INJURY/ILLNESS Type 1:

Code 1 - OSC, Notify SFSFD

Code 2 - FC, OFC, SFSFD, PD, PC, ERT(OS)

Code 3 - IMT, PD, FD, ERT(OF)

MATERIAL RELEASE Type 2:

Code 1 - OSC, Notify SFSFD

Code 2 - OSC, FC, OFC, SFSFD, PC, HT, ERT(OS)

Code 3 - IMT, PD, ERT(OF)

Type 3: BOMB THREAT

> - OSC, FC, OFC, IC, ERT(OS), PD, PC, Code 2

Notify SFSFD

Code 3 - IMT, FD, SFSFD

Type 4: PIPELINE LEAK REPORT

Code 1 - P/L OFC, ERT(OF), PC

Code 2 - P/L, WHEEL, FD, FC, PD, OFC

Code 3 - IMT

EMERGENCY TYPE 1 - FIRE, EXPLOSION, INJURY, ILLNESS, NATURAL DISASTER

Purpose: The purpose of this document is to describe and provide proper guidelines to follow in the event of a fire, explosion, injury, illness, and/or natural disaster arising within the refinery.

Objectives:

- 1. Identify the nature and location of the incident.
- Rescue and provide medical care for injured.
- 3. Contain the adverse impact of the incident.
- 4. Protect involved property from further damage.
- 5. Assess damage of the incident.
- 6. Insure the notification of necessary personnel.
- 7. Notify appropriate local agencies for safety, security, and legal purposes.
- 8. Expedite repair activities to minimize the loss of production.
- 9. Provide documentation and review criteria for incidents.

Definitions

Fire and Explosion

- A. Code 1: Containable by in-plant personnel. In this degree usually no other units or areas of the refinery will be affected. The fire should be either self-extinguished or be extinguished by use of a portable first aid type appliance (fire extinguisher, foam station, etc.).

 EXAMPLES: Trash containers, small switch gear fires, vehicle fires. Alarm to be sounded at the On-Site Coordinator's discretion and SFSFD be notified of the incident.
- B. Code 2: Containable but with appropriate management notification and emergency response team (on-site) needed. This degree includes emergencies that require additional help (intra-refinery) to contain and extinguish. This degree may require the use of foam stations, fire monitors, and/or mobile fire fighting equipment. EXAMPLE: a small unit fire during day shift. Alarm to be sounded and SFSFD be notified of the incident.
- C. Code 3: Uncontrollable by refinery personnel; assistance from municipal agencies (SFSFD, PD) required. This degree includes emergencies that require notification of the refinery Incident Management Team. EXAMPLES: storage tanks on fire, ruptured line going to the thermal oxidizer, large unit fire, intra-refinery pipeline rupture and fire.

Injury/Illness

A. Code 1: Patients with minor injuries or illnesses who are ambulatory and with good vital signs. EXAMPLES: minor burns, sprains, strains, possible fractures or dislocations. Medical care can be possibly delayed if Code 2 or 3 injuries/illnesses are involved.

Definitions (continued)

- B. Code 2: All injuries/illnesses requiring outside medical assistance either on-site or needed for transportation.
- C. Code 3: An incident resulting in loss of life or multiple serious injuries leading to life threatening situations.

3. Natural Disaster

- A. Code 1: Incident which does not result in significant loss of facility operation or throughput. EXAMPLES: minor earthquake resulting in no power loss or flooding.
- B. Code 2: Incident which results in the short-term loss of production or product delivery capability due to unit shut-down without significant damage. EXAMPLES: earthquake, heavy rains, or high winds resulting in power loss, heavy rains resulting in flooding.
- C. Code 3: Incident which results in the loss of any production or product delivery capability with significant equipment damage.

 EXAMPLES: large earthquake resulting in tank ruptures, unit towers collapsing, intra-refinery pipeline ruptures; high winds knocking out unit towers.

Responding Agencies

- A. Code 1: OSC, Notification of SFSFD
- B. Code 2: FC, OFC, ERT(OS), SFSFD, PD, PC
- C. Code 3: IMT

EMERGENCY TYPE '2' - MATERIAL RELEASE

Purpose: The purpose of this document is to provide proper guidelines to follow so that damage or harm to the public, refinery personnel, equipment, and property are minimized in the event of a release within the Refinery.

Objective:

- 1. Identification of the type of release and hazard level.
- 2. Evacuation of affected personnel.
 - a) public
 - b) refinery
- 3. Isolate, stop, and mitigate impact of the release.
- 4. Notification of appropriate local agencies.

Definitions

1. Release

A. Organic vapor (Hydrocarbons)

Examples: Propane, Butane, LPG (Propane/Butane

mix), Natural Gas.

Hazard: These materials may ignite or flash

back upon reaching any source of ignition

(i.e. spark plugs from automobiles,

cigarette, etc.). Explosions are possible

if the organic/oxygen concentration

exceed the explosive limit.

B. Organic Liquid (Hydrocarbons, Alcohols)

Examples: Gasoline, Stove Oil (Jet Fuel),

Kerosene, Lube Oils, Diesel,

Gas Oils, Solvents.

Hazard: These materials are a source of fire

and combustion. Use water only when cooling piping. Use absorbent when

cleaning up.

C. Organic Solid (Hydrocarbon)

Examples: Petroleum Coke, Heavy Vacuum Gas Oil (at

70 F) etc., Vacuum residuum.

Hazard: Material will ignite in presence of strong

flame.

Definition (continued)

D. Inorganic Vapor

Examples: Hydrogen Sulfide (H2S), Chlorine Gas,

Nitrogen, Helium, etc.

Hazard: Material displaces oxygen - (Wear

self-contained breathing apparatus

when responding)

E. Inorganic Liquid

Examples: Diglycol Amine (DGA)

Monodiethanol Amine (MDEA - Ucarsol),

Stretford solution, Caustic

Hazard: Material may evolve H2S at 70F or

greater - Wear self-contained breathing

apparatus when responding. Material is very

corrosive.

F. Inorganic Solid

Examples: Sulfur, Catalyst.

Hazard: Material may evolve H2S or Hydrocarbon.

Wear self-contained breathing apparatus.

G. Acid Gas/Liquid

Examples: Hydrogen Fluoride (HF), Hydrogen

Chloride (HCl), Sulfuric Acid (H2SO4), Sulfur Dioxide (SO2), Sulfur Trioxide

(SO3).

Hazard: Material is very corrosive and may

vaporize into cloud upon release into

atmosphere.

Codes (Degree of Emergency):

- A. Code 1: Containable by in-plant personnel. The material release is isolatable with an unlikely chance of further damage or threat to personnel. Low probability that release will move off-site.
- B. Code 2: Any release of sufficient quantity requiring evacuation, notification of management, notification of emergency units, or notification of special clean-up crews. Containment by in-plant personnel is probable. Sounding of alarm is required.
- C. Code 3: Uncontrollable by in-plant personnel; Management and emergency units required. All emergency response units prepared to assist. Sounding of alarm is required.

Definition (continued)

NOTE: On any notification of release, respiratory equipment is mandatory during preliminary investigations.

- 3. Responding Agencies:
 - A. Code 1: OSC, Notify SFSFD
 - B. Code 2: FC, OFC, SFSFD, ERT(OS) PC, HT
 - C. Code 3: IMT, PD, ERT(OF)

EMERGENCY RESPONSE TO AN HF ACID RELEASE

Code 1

Description: Small HF acid leak or small HF acid laden hydrocarbon leak that is containable by in-plant personnel and has no affect on other refinery units. No movement of material off-site. Examples: acid emulsion pump (AP-1) seal leak or, acid vapors leaking from flange gasket on isostripper overhead vapor line. Handled entirely by normally scheduled operations and maintenance technicians and crafts.

Code 2

Description - An acid release that can be contained within the plant, but could easily become uncontrollable (Code 3). Examples: blown sight glass on the depropanizer feed settler.

Code 3

Description - Acid release that cannot be contained within the plant and requires evacuation of the surrounding community. Example: A hole in the acid storage drum resulting from a pipe dropped from a crane, any acid release that may escape the northern boundary of the Alky Unit.

Responding Agencies:

- A. Code 1: Incident report to Environmental Coordinator
- B. Code 2: OSC, OFC, FC, SFSFD, ERT(OS), PD, IC, PC, HT
- C. Code 3: ERT(OF), IMT

EMERGENCY TYPE 3 - "BOMB THREAT"

Purpose: The purpose of this document is to describe and provide proper guidelines to follow in the event of a bomb threat and/or actual bomb incident arising within the refinery.

Objective:

- 1. Insure a calm and orderly response to any bomb threat situation.
- Provide guidelines for threat recipients for the handling of bomb threat incidents.
- 3. Establish proper communication channels for reporting receipt of bomb threat.
- 4. Provide guidelines for establishment of search teams, search team procedures, and partial or complete site evacuation.
- Provide for appropriate investigation of all bomb threat incidents.

Definition:

- 1. Code 1: None.
- 2. Code 2: Receipt of any threat or information indicating an explosive device on the refinery property.
- Code 3: Discovery of a device.

Responding Agencies

- Code 2 OSC, FC, OFC, IC, ERT(OS), PD, PC SFSFD NOTIFICATION
- 2. Code 3 IMT, FD

INCIDENT COORDINATOR

Personnel: Senior Vice President (Alternate Operations Manager)

Purpose: The Incident Coordinator (IC) is responsible for overall management of the incident. The IC will provide management direction of the various aspects of the incident and coordinate the activities of the Field Coordinator, Off-Site Coordinator, Press Coordinator and Services Coordinator.

Responsibility

- Coordinate and organize response to the incident.
- 2. Supervise all of the activities through the individual IMT Activity Coordinators.
- 3. Take actions affecting all refinery activities appropriate to response.
- 4. Establish and manage the Command Center.
- 5. Conduct a post-incident review of the response.

- 1. Proceed to the site of the incident.
- Determine the magnitude of the incident through the Field Coordinator and On-Site Coordinator.
- 3. Determine the status of the response and the appropriateness of the response.
- 4. Go to the Command Center when a Command Center is required or remain at the Field Command Center where a Command Center is not required.
- 5. Keep up to date on the incident through the Activity Coordinators and through site inspections.

FIELD COORDINATOR

Personnel: Safety Superintendent (Alternate Unaffected Shift Supervisor)

Purpose: The Field Coordinator (FC) is responsible for overall Management of the incident site activities and is responsible to the Incident Coordinator. The FC will provide direction to the response group directly involved in controlling and mitigating the incident.

Responsibility

- 1. Provide on-site coordination and response to the incident.
- 2. Direct fire fighting, spill control and rescue operations.
- Coordinate with outside fire and police departments.
- 4. Provide safety and health protection.
- 5. Manage process protection through the on-site coordinator.
- 6. Keep the Incident Coordinator informed as to the incident status.
- 7. Assign other superintendents and supervisors.
- 8. Evaluate and determine response level and up grades.
- 9. Notify the Call Out Center.

- 1. Proceed to the incident site.
- 2. Coordinate with the On-site Coordinator.
- 3. Establish a Field Command Center.
- Contact and direct the outside fire and police on-site.
- 5. Determine if the response level is appropriate.
- If necessary change response level by contacting Call Out Center.

EMERGENCY RESPONSE TEAM ON SHIFT (OS)

Personnel: The individuals on-site at the time of the emergency designated as members of the ERT.

Purpose: To maintain an efficient and effective first response team to respond to plant emergencies. Responsible to the OSC or RF depending on the response level.

Responsibility

- 1. To provide immediate response to all types of emergencies.
- To control, prevent, or mitigate injories an damage, initiate rescue activities and see that first aid is rendered to the injured.
- 3. Begin actions as directed by the On-Site Coordinator to prevent further spread of the emergency and protect equipment exposed to hazards.
- 4. Remain at the emergency scene to aid in securing the area until released by the On-Site Coordinator.

- Put on turnout gear.
- 2. Report to On-Site Coordinator at emergency location.
- 3. Initiate rescue and first aid activities.
- 4. Initiate fire or emergency activities as directed.
- 5. Remain at scene until secured and released by On-Site Coordinator.

EMERGENCY RESPONSE TEAM OFF-SITE (OF)

Personnel: The memebers of the ERT who at the time of the emergency are off-site.

Purpose: To provide an effective and efficient second response to a plant emergency.

Responsibility/General Procedure

- Upon alarm notification, report to the plant and Put on turnout gear.
- Report to emergency location as directed by On-Site Coordinator.
- Begin actions as directed by On-Site and Field Coordinators. To prevent further spread of emergency and protect equipment exposed to hazards.
- 4. Aid in returning all fire equipment to ready condition.

OFF-SITE COORDINATOR

Personnel: Coordinator Environmental Affairs (Alternate Senior Environmental Engineer, Lab Supervisor)

Purpose: The Off-Site Coordinator (OFC) is responsible for response to any incident that has impacted anyone or facility off the refinery site. The OFC is responsible for directing control, containment and mitigation of damage and injury off-site. The OFC will interface with outside agencies and make required notifications to agencies.

Responsibility

- Direct control, containment and mitigation of incident occurring off-site.
- Direct response to on-site incident's off-site impact (gas release or spill).
- 3. Interface with regulatory agencies.
- 4. Make required notifications to regulatory agencies.
- 5. Interface with neighbors through SFSFD.

- 1. Proceed to the incident site.
- 2. Organize and direct response to incident.
- Identify the off-site receptors.
- 4. Determine need to notify agencies.
- 5. Brief agencies coming to site.
- 6. Respond to neighbors.
- 7. Remain at incident site.

OUTSIDE FIRE PROTECTION

Two Forms of Protection

- 1. Municipal Agencies, Santa Fe Springs Fire Department and paramedics etc.
- 2. "Mutual Aid", specialized foam fire fighting equipment from other refineries in the L.A. basin.

Purpose: To assist the refinery in an effort to control an incident.

Responsibility

- 1. Render medical aid to any injured personnel.
- Assist with incident control.
- 3. Assist with an evacuation which may be required.

- Respond to incident area as notified by On-Site Coordinator.
- Stay on-site until incident has been determined safe and secure.

SECURITY

Personnel: The plant security individual whose normal duty is based at Gate 4 Security Office.

Purpose: Security is responsible for accounting for all personnel entering or leaving the Plant. Also accounting for all personnel on-site at the time of the incident assist with call outs of key personnel and coordinating with local Police. Responsible to the OSC or the FC depending on the level of the incident.

Responsibility

- Account for all personnel at the time of incident. (Head Count).
- Limit access through plant gates.
- 3. Man gates at emergency location and control access and egress.
- Coordinate with local Police, (road blocks and plant access).
- 5. Direct media personnel to Press Coordinator.
- Assist with call out procedure for key personnel and urgently needed outside agencies or contractors.

- Open and man gate where On-Site Coordinator directs.
- Direct fire or emergency vehicles from the street to the incident site.
- Maintain one guard at Gate #4 Security Office at all times.
 (Taking care of main gate access and manning the phones).
- 4. Once assignments are made hold positions until relieved or receive an "ALL CLEAR" from the On-Site Coordinator or Field Coordinator.
- 5. Limit access to those persons authorized by the On-Site Coordinator or Field Coordinator.
- 6. Direct any press or media personnel to the Press Coordinator.

ON-SITE COORDINATOR

Personnel: Shift Supervisor in area where incident has occurred

Purpose: The On-Site Coordinator (OSC) is the Supervisor in the division of the incident and is responsible for direct response to the incident. The OSC directs the protection of the facility involved and controlling and mitigating the incident.

Responsibility

- Organize and direct the response to the incident at the site.
- 2. Conduct fire fighting, spill control and rescue.
- 3. Protect the unit involved.
- Set the Emergency Response Plan in motion by notifying the Call Out Center.
- 5. Coordinate with the Field Coordinator.
- Coordinate with other process units.

- 1. Proceed to incident site.
- Initiate response.
- 3. Notify Call Out Center of type and code of emergency.
- 4. Remain at incident site and direct response.
- Communicate with Field Coordinator.

MEDICAL EMERGENCY CHIEF

Personnel: Safety Supervisor

Purpose: The medical chief is responsible for the care of persons who are injured or may have had excessive exposure to toxic agents at the plant. Responsible to the FC.

Responsibility

- 1. Establish necessary field medical stations.
 - (a) First aid station set-up in the employee lunch room in administration building.
 - (b) Lunch room in Refinery if possible.
- Take responsibility for injured persons.
- 3. Coordinate with the Transportation and the Engineering and Rescue chiefs.

- 1. Proceed to incident site.
- 2. Report to the OSC or FC.
- Communicate with Engineering and Rescue chiefs.
- Pick up supplies and equipment that will be needed.
- 5. Notify hospital and paramedics if needed.
- 6. Keep the On-Site Coordinator and Field Coordinator advised about seriously injured persons and fatalities.

MAINTENANCE & RESCUE TEAM (MRT)

MRT Chief: Maintenance and Construction Manager (Alternates: Designated Maintenance Supervisor)

Purpose: To affect rescues, make repairs and maintain services as required during an emergency. Responsible to the FC.

Responsibilities

- Assign, train and equip adequate personnel to accomplish purpose.
- Locate, confine and control emergency situations.
- 3. Perform rescue tasks.
- Maintain continuity of water supply, fire pump operation, electrical power and on scene emergency lighting.
- 5. Perform necessary repairs to keep the Refinery operating.
- 6. Maintain drawing files necessary to affect repairs.
- Assist the Emergency Response Team with protecting the Refinery during toxic or explosive gas releases.

- Assemble at the weld slab, put on appropriate protective clothing, await instruction of Field Coordinator.
- Affect rescue of personnel, repair damaged equipment and/or maintain essential utilities for Refinery operation.
- 3. Coordinate group efforts with outside agencies.
- 4. Assist in the general clean-up after emergencies.

TECHNICAL SERVICES

Personnel: Technical Services Manager (Alternate Chief Process Engineer)

Purpose: The Technical Services group will respond to the needs of the entire refinery during an emergency in the form of aid to manpower and control room needs, environmental assistance to the Off-Site Coordinator, and engineering process design aid to On-Site and Field Coordinators.

Responsibilities

- Provide assistance to all Area Superintendents in control rooms or as directed.
- Plan for detection/testing and containment of all environmental contaminants resulting from emergency or mitigation exercises.
- 3. Scope out potential dangers and advise Field Coordinator.
- Assist Field Coordinator in providing proper measures to be taken for addition/removal of piping and/or re-routing of refinery product streams.
- 5. Advise Field Coordinator of special hazards and protection measures that may be required.
- 6. Assist in all manpower needs as directed by the Field Coordinator.

- 1. Process Engineers report to Area Superintendents and proceed to designated control rooms. If not needed proceed to incident.
- 2. Engineers report to Field Coordinator and provide immediate support to On-Site Coordinator.

SERVICES COORDINATOR

Personnel: Maintenance Manager (Alternate: Electrical Superintendent, Instrument Superintendent)

Purpose: The Service Coordinator (SC) is responsible for directing the efforts of those performing the duties of Employee Relations Transportation, Purchasing, Utilities, Medical and Communications during an emergency. The SC will report directly to the Incident Coordinator and communicate with the Field Coordinator during emergencies.

Responsibilities

- 1. Assign adequately trained personnel emergency response duties in the areas listed above.
- 2. Communicate with outside contractors to establish contingency plans in the event of an emergency.
- 3. Establish minimum stock levels of basic items needed during emergencies.
- 4. Maintain current information necessary to contact employees, families, vendors, utilities, hospitals and emergency services agencies. Work with Employee Relations
- 5. Establish relief plan for long duration emergencies.
- 6. Establish evacuation plans for the Refinery and Administration Building.

- Assemble assigned personnel at the Field Center and check in with the Field Coordinator.
- Respond to current situation.
- 3. Advise Incident Coordinator of activities.
- Evaluate response to the emergency after its conclusion.

EMPLOYEE RELATIONS (Refinery Emergency)

Purpose: Provide additional manpower for emergency requirements, act as liaison between Powerine and hospitals or clinics and employees and their families. Responsible to the Services Coordinator.

Personnel: Director Employee Relations (Alternate: Employee Relations Representative)

Responsibilities

- Provide assistance in or supervise telephoning of off-site employees being called in to work during/after emergency.
- Provide workers compensation insurance information, employee data (dates of birth, etc.) other information requested by hospitals(s) and/or industrial clinic(s).
- Assist Safety and Security Chief in coordinating head count, missing/injured reporting.
- Contact employees' families as necessary, and assist as requested with medical updates, transportation, etc.
- Work with Safety and Security Chief to notify contractors' companies of contractors injured.
- 6. Keep Incident Coordinator informed about:
 - a. Injured/missing employees.
 - b. Off-site employees called in.

TRANSPORTATION

Personnel: Warehouse Supervisor (Alternate: Mechanical Planner)

Purpose: To supply necessary personnel, plans and equipment to meet the transportation needs of an emergency situation. The Transportation Chief will report to the Services Coordinator.

Responsibilities

- Maintain adequate personnel and equipment to supply the Refinery with essential materials and services.
- 2. Establish road maps and road signs to guide resources to the incident site.
- Communicate with outside services for equipment/ services needed to evacuate the Refinery and neighboring areas.
- 4. Maintain adequate fuel supplies for emergency vehicles.

- 1. Report to the Services Coordinator at the Field Center during an emergency and remain available.
- Assemble necessary vehicles at a safe location for use as needed.
- 3. Periodically check equipment in use for adequate fluid levels.
- 4. Assist with general clean-up after emergencies.

PURCHASING DEPARTMENT

Personnel: Manager Purchasing (Alternate Buyer Purchasing)

Purpose: To support the Services Coordinator (SC) through the procurement of supplies and services required during an emergency.

Responsibilities:

Purchasing Manager

- Remain in the Purchasing Department during the emergency, unless the emergency site precludes that.
- 2. Direct the purchasing activities of staff.
- 3. Communicate with outside vendors to procure equipment/supplies/services.

Buyers

- 1. Report to the Command Center for evaluation of equipment/supplies/services needs.
- Take instructions from Services Coordinator at Off-Site Command Center.
- If communication with suppliers is not possible, e.g., during a major earthquake, report to the Services Coordinator for assignments at the Off-Site Command Center.

Secretaries

- Secretary A Report directly to the Purchasing Manager.
- Secretary B Report to the buyers from their location at the Off-Site Command Center. Assist them as necessary from Purchasing Department.

PURCHASING DEPARTMENT (continued)

- Note 1: If telephone communication fails, department personnel (except for Manager) become runners to deliver/pickup equipment/supplies/messages. Manager to coordinate this effort.
- Note 2: Purchase Order procedure would be temporarily bypassed in extreme emergency; paperwork (P.O.'s) would be done afterward.

UTILITIES

Personnel: Maintenance "A" Supervisor (Alternate: Maintenance Supervisor)

Purpose: To maintain the supply of utility air, water, electricity and gas as necessary for use during an emergency. Utilities Chief reports to the Service Coordinator.

Responsibilities

- Identify locations of entry/control of all utilities.
- 2. Establish a list of contacts with utility suppliers (24 hours).
- 3. Maintain necessary supplies to insure utility services are kept available.

- 1. Report to Field or Command Center as appropriate.
- 2. Man utility entry/control locations and insure constant availability of all services. Work with Maintenance and rescue to re-establish lost utility services.

COMMUNICATION

Personnel: Electrical Superintendent (Alternate: Instrument Superintendent)

Purpose: Provides, maintains and controls all means of communications between the emergency site, field center, command center and outside agencies. The Communications Chief reports to the Services Coordinator.

Responsibilities

- 1. Supply telephone, radio and messenger communication equipment, training and contingency plans in the event of an emergency.
- 2. Establish and maintain adequate telephone and radio call number lists for emergency use.
- 3. Establish off site communications capability in the event of a catastrophic incident at the Refinery.
- 4. Establish a call-in/call-out procedure for employees/families.
- 5. Affect repairs to communications systems if damaged.
- 6. Establish and maintain warning alarms (sirens) during emergencies.

General Procedures

- 1. Report to the Services Coordinator at the Field Center during an emergency and remain available.
- Verify clear communications are available.
- 3. Organize and supply spare batteries for radios.
- Verify/perform notification of appropriate personnel.

HAZMAT TEAM

Personnel: Pipeline Maintenance Supervisor (Chief), Lab Supervisor (Alternate: Pipeline Engineer, Pipeline Superintendent, Maintenance Manager)

Purpose: The Hazmat Team will provide assistance to the Off-Site Coordinator (OFC) and Field Coordinator (FC) in the form of extra manpower needed in the refinery and manpower needed to address environmental issues.

Responsibilities

- Assist refinery manpower needs as the emergency dictates (escalation, etc.).
- 2. Provide support to the Maintenance and Rescue team.
- Assist OFC in contacting and handling outside agencies as needed.
- Assist OFC in notification procedures for neighbors.
- 5. Assist outside medical agencies in the handling of injured or contaminated personnel.
- 6. Assist OFC in containment/disposal procedures to be used for off-site releases (waste fire water, gases, hydrocarbons, etc.).

General Procedures

- 1. Go to the incident scene.
- 2. Report to OFC and await instructions.
- Report to FC and respond to maintenance/rescue needs.
- 4. Provide manpower relief to fire fighting teams.

PRESS COORDINATOR

Personnel: President (Alternate: Director Employee Relations)

Purpose: The Press Coordinator (PC) is responsible for all information going to the press. The PC is responsible for controlling the press responding to an incident. The PC establishes a Press Center.

Responsibility

- Releases all information to Press.
- 2. Interfaces with Media representatives.
- 3. Establishes the Press Center.
- 4. Keeps up to date on the incident.
- 5. Communicates with Incident, Field and Off-Site Coordinators.

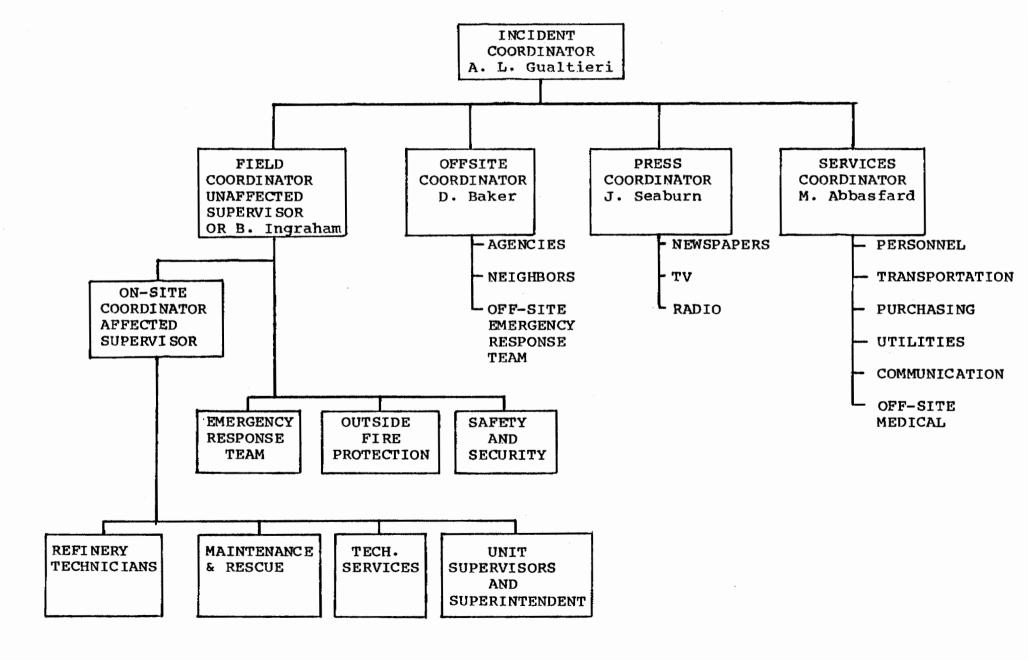
General Procedure

- Proceeds to the Command Center.
- 2. Establishes a Press Center.
- 3. Determines status of Incidents.
- 4. Meets Press as they arrive.
- 5. Prepare Press releases as information becomes available.

EPP ORGANIZATIONAL

CHART

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REFINERY

EVACUATION

PLAN

POWERINE OIL COMPANY

PLANT EVALUATION

PURPOSE

This section should insure the safety of the personnel from fire and all emergencies by providing an efficient evacuation procedure.

OBJECTIVES:

- 1. Identify primary and alternate evacuation routes and collection points.
- 2. Establish a person or persons to take control of evacuation as directed by the Incident Coordinator, which will be the Security Department and Building Captains.
- 3. Appoint Building Captains and alternates to insure emergency communication and evacuation of all building areas.

PROCEDURES:

- During the evacuation in an emergency, the Incident Coordinator will contact Security to implement the complete or partial evacuation of the Refinery.
- The Incident Coordinator shall keep in contact with Security on Radio Channel #1.
- 3. The Incident Coordinator, based on the circumstances of the emergency, will evaluate whether this should be a permanent evacuation or to allow the personnel to return to work.
- 4. Security, on direction from the Incident Coordinator, will implement the following:
 - A: Establish communications with Building Captains.
 - B: Direct the Building Captains to direct evacuation of personnel, to follow routes selected by the Incident Coordinator and Security.
 - C: Monitor that the evacuation is being handled in a safe and proper way.
 - D: Identify collection points where employees are to meet.
- 5. Building Captains, upon hearing the emergency alarm will:
 - A: Stand by a phone of radio (Channel 1) and await instructions.
 - B: Complete a head count of the normal staff in their area.
 - C: Obtain assistance from anyone in the area to accomplish the task of evacuation.
 - D: The Building Captain should be the last person to leave assigned area to insure that everyone has departed.

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- E. Direct evacuation of the building area assigned, and direct evacuation route and collection point selected.
- F. Building Captains will be identified and posted for each building or area of a building either in the Refinery, Santa Fe Springs Terminal or Main Office.
- 6. The evacuation routes and collection points will be posted as shown on the attached map.
- 7. Contractors are to receive the evacuation route map from Gate #4 Security on initial entry to the Refinery. Upon hearing the alarm, contractors will assemble at Gate #4 and wait for instructions from the Maintenance Manager.

NOTE:

During fires all doors and windows are to be closed. During a bomb threat all doors and windows to to be left open.

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EVACUATION ROUTES

Crude Unit

- 1) Direct to Gate #3
- 2) Direct to front of Carpenter Shop

Isom

- 3) Direct to Gate #3
- 4) Direct to road to Gate #4

Tech Service Building

- 5) Direct to Gate #3
- 6) Direct to front of carpenter shop

Operations/Maintenance Office/Lab

- 6) Direct to front of carpenter shop
- 2)6) Direct to Gate #4

Lomax

- Direct to carpenter shop
- 2)6) Direct to Gate #4

Welding Slab

Same as above

FCC

- Direct to front of carpenter shop
- 8)6) Direct to Gate #4

Instrument/Electric Shops

- 7) Direct to front of carpenter shop
- 8) Direct to Gate #4

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H.O.U.

- 9)6) Direct to Gate #4
- 10) Direct to coke handling area

Blending

Assemble at Gate #4
11) Direct to Gate #3

COLLECTION POINTS

A: Gate #4

B: Gate #3

C: Front of Carpenter Shop

D: Coke Handling Area

NOTE:

- 1) Collection points are indicated on map as A, B, C, D
- 2) Evacuation Route #'s indicate which route to the nearest collection point for example: follow route 8 to 6 then to nearest collection point.

